

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
DHS Policies and Procedures Manual	Initial Disclosures	12/28/2004
Bulletin #5922 from Billy Mangold, Dir DFCS re Reports Involving Residents of Unlicensed Personal Care Homes with AG's Opinion dated 5/2/03	2nd Supplement of 1st RPD #2	4/11/2005
Cover page for the Project which includes the Index	1st RPD #3 and #22	3/4/2005
Org Charts for Division of Family and Children's Services - broken down by Division through County levels	1st RPD #3 and #22	3/4/2005
Index page for MDHS Org Charts and MDHS FY 2004 Org Charts - broken down by Department through County levels	1st RPD #3 and #22	3/4/2005
Direct Service Clients by Region and County - for December 2004	1st RPD #3 and #22	3/4/2005
Social Services Employee Report -headcount of all positions via region and county, along with address, etc. of employees - 12/03/04	1st RPD #3 and #22	3/4/2005
Direct Service Clients by Region and County - for October 2004	1st RPD #3 and #22	3/4/2005
Social Services Employee Report -headcount of all positions via region and county, along with address, etc. of employees - 10/06/04	1st RPD #3 and #22	3/4/2005
Direct Service Clients by Region and County - for July 2004	1st RPD #3 and #22	3/4/2005
Social Services Employee Report -headcount of all positions via region and county, along with address, etc. of employees - 7/13/04	1st RPD #3 and #22	3/4/2005
Direct Service Clients by Region and County - for April 2004	1st RPD #3 and #22	3/4/2005
Social Services Employee Report -headcount of all positions via region and county, along with address, etc. of employees - 4/12/04	1st RPD #3 and #22	3/4/2005
Direct Service Clients by Region and County - for January 2004	1st RPD #3 and #22	3/4/2005
Social Services Employee Report -headcount of all positions via region and county, along with address, etc. of employees - 1/06/04	1st RPD #3 and #22	3/4/2005
January - October 2004 Resignations and Terminations	1st RPD #3 and #22	3/4/2005
January - October 2004 Personnel Actions	1st RPD #3 and #22	3/4/2005
Hiring Ratios - Memo re Social Worker positions being returned due to insufficient funding or other reasons for them to be held	1st RPD #3 and #22	3/4/2005
Staffing Workload Charts	1st RPD #3 and #22	3/4/2005
Population Workload Charts	1st RPD #3 and #22	3/4/2005
Workload Charts which includes Workers Needed - broken down into categories of Optimum (12 cases), Acceptable (18), Marginal (25), Danger! (31) or Beyond Danger! (40+)	1st RPD #3 and #22	3/4/2005
MACWIS Reports Listing	1st RPD #4 and #6	3/4/2005
National Department of Health & Human Services Letter by John A. Gaudiosi to Robin Wilson, MDHS, DFCS re "Review of NC&S Child & Agency Files, Data Year 2002"	1st RPD #5 #6 and #35	2/23/2005
National Department of Health & Human Services Letter by John A. Gaudiosi to Robin Wilson, MDHS, DFCS re "Review of NC&S Child & Agency Files, Data FFY2003"	1st RPD #5 #6 and #35	2/23/2005
Service Request (#20980) Completion Checklist w/ 6/30/03 "Call Record", 6/10/03 Letter from Robin Wilson to Cheryl Joiner, 1/3/03 Letter from NRCITCW to Janice Brooks w/ attachments	1st RPD #5 #6 and #35	2/23/2005
2003 A AFCARS Foster Care Data Compliance Detailed Report	1st RPD #5 #6 and #35	2/23/2005
2003 B AFCARS Foster Care Data Compliance Detailed Report	1st RPD #5 #6 and #35	2/23/2005
2004 A AFCARS Foster Care Data Compliance Detailed Report	1st RPD #5 #6 and #35	2/23/2005
2003 B AFCARS Foster Care Data Compliance Detailed Report	1st RPD #5 #6 and #35	2/23/2005

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Document Description	Produced In Response to	Date Produced
USDHHS "National Child Abuse & Neglect Data System [NCANDS] Summary Data Component Survey 2000 Data Year"	2nd Supplement to 1st RPD #5	4/11/2005
March 2002 AFCARS Foster Care Data Compliance Detailed Report	2nd Supplement of 1st RPD #5	4/11/2005
September 2002 AFCARS Foster Care Data Compliance Detailed Report	2nd Supplement of 1st RPD #5	4/11/2005
MACWIS Technical Workplan for Changes & Enhancements	1st RPD #6	3/4/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for April 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for May 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for June 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for July 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for August 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for September 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for October 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for November 04	1st RPD #7	3/23/2005
MDHS Listing of Children Currently in Custody with Conference Report Date More Than 6 Months for December 04	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of July 2002	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of August 2002	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of September 2002	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of October 2002	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of December 2002	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of November 2002	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of February 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of January 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of March 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of April 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of May 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of June 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of July 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of August 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of September 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of October 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of November 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of December 2003	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of January 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of February 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of March 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of April 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of May 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of June 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of July 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of August 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of September 2004	1st RPD #7	3/23/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
MDHS Pending Conference Reviews for the Month of October 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of November 2004	1st RPD #7	3/23/2005
MDHS Pending Conference Reviews for the Month of December 2004	1st RPD #7	3/23/2005
MDHS Children Leaving Custody for September 2004	1st RPD #7	3/23/2005
MDHS Children Leaving Custody for October 2004	1st RPD #7	3/23/2005
MDHS Children Leaving Custody for November 2004	1st RPD #7	3/23/2005
MDHS Children Leaving Custody for December 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for July 2003	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for August 2003	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for October 2003	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for November 2003	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for January 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for February 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for March 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for May 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for June 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for July 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for August 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for September 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for October 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for November 2004	1st RPD #7	3/23/2005
Listing of Children Currently in Custody for December 2004	1st RPD #7	3/23/2005
Active cases Without No Active ISP	1st RPD #7	3/23/2005
Active cases Without No Active ISP	1st RPD #7	3/23/2005
Active cases Without No Active ISP	1st RPD #7	3/23/2005
Active Cases/No Active ISP	1st RPD #7	3/23/2005
Active Cases/No Active ISP	1st RPD #7	3/23/2005
Active Cases/No Active ISP	1st RPD #7	3/23/2005
Active Cases/No Active ISP	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/4/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/4/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/4/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/4/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/4/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/4/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
Dormant Cases - No Activity for 6 Months or More	1st RPD #7	3/23/2005
MDHS Abuse & Neglect Intake Report in February 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in March 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in April 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in May 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in June 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in July 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in August 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in September 2004	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
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MDHS Abuse & Neglect Intake Report in October 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in November 2004	1st RPD #7	3/4/2005
MDHS Abuse & Neglect Intake Report in December 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for February 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for March 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for April 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for May 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for June 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for July 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for August 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for September 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for October 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for November 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for December 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for February 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for March 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for April 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for May 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for June 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for July 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for August 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for September 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for October 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for November 2004	1st RPD #7	3/4/2005
MDHS Adult Abuse & Neglect Intake Report for December 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for February 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for March 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for April 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for May 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for June 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for July 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for August 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for September 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for October 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for November 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for December 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for February 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for March 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for April 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for May 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for June 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for July 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for August 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for September 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for October 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for November 2004	1st RPD #7	3/4/2005
MDHS Child Abuse & Neglect Intake Report for December 2004	1st RPD #7	3/4/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
ASFA Compliance Report - Custody that could not be processed correctly	1st RPD #7	3/23/2005
ASFA Compliance Report – Children Who Have Been in Custody for 15 or More of the Past 22 Months	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 8/13/04	1st RPD #7	3/4/2005
MDHS Custody Contact Report as of 9/10/04	1st RPD #7	3/4/2005
MDHS Custody Contact Report as of 10/09/04	1st RPD #7	3/4/2005
MDHS Custody Contact Report as of 11/10/04	1st RPD #7	3/4/2005
MDHS Custody Contact Report as of 12/10/04	1st RPD #7	3/4/2005
MDHS Custody Contact Report as of 01/10/05	1st RPD #7	3/4/2005
MDHS Custody Contact Report as of 06/16/04	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 07/20/04	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 09/10/04	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 10/09/04	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 11/10/04	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 12/10/04	1st RPD #7	3/23/2005
MDHS Custody Contact Report as of 12/10/04	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 06/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 8/16/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 08/16/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 09/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Investigations Open More Than 30 Days as of 09/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 10/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 10/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 11/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 11/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 12/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 12/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 01/15/05 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 01/15/05 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 06/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 07/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 08/16/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 09/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 10/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 11/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 12/15/04 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 01/15/05 - ANE Child Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 07/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 08/16/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 09/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 10/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 11/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 12/15/04 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 01/15/05 - ANE Adult Only Records	1st RPD #7	3/4/2005
Investigations Open More Than 30 Days as of 06/15/04 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 07/15/04 - ANE Child Only Records	1st RPD #7	3/23/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Investigations Open More Than 30 Days as of 08/16/04 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 09/15/04 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 10/15/04 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 11/15/04 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 12/15/04 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 07/15/04 - ANE Adult Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 09/15/04 - ANE Adult Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 10/15/04 - ANE Adult Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 01/15/05 - ANE Child Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 11/15/04 - ANE Adult Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 12/15/04 - ANE Adult Only Records	1st RPD #7	3/23/2005
Investigations Open More Than 30 Days as of 01/15/05 - ANE Adult Only Records	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/23/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Request for Reimbursement of Family & Children Services Funds	1st RPD #7	3/4/2005
Listing of Children with Eligibility Status	1st RPD #7	3/4/2005
Listing of Children with Eligibility Status	1st RPD #7	3/4/2005
Listing of Children with Eligibility Status	1st RPD #7	3/4/2005
Listing of Children with Eligibility Status	1st RPD #7	3/4/2005
Listing of Children with Eligibility Status	1st RPD #7	3/23/2005
Listing of Children with Eligibility Status	1st RPD #7	3/23/2005
Listing of Children with Eligibility Status	1st RPD #7	3/23/2005
Listing of Children with Eligibility Status	1st RPD #7	3/23/2005
Listing of Children with Eligibility CWS	1st RPD #7	3/4/2005
Listing of Children with Eligibility CWS	1st RPD #7	3/23/2005
Listing of Children with Eligibility IVE	1st RPD #7	3/4/2005
Listing of Children with Eligibility IVE	1st RPD #7	3/23/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Listing of Children with Eligibility IVE	1st RPD #7	3/4/2005
Listing of Children with Eligibility IVE	1st RPD #7	3/23/2005
Avg. Length of Time between Court Custody and Adoption Finalization	1st RPD #7	3/4/2005
Avg. Length of Time between Court Custody and Adoption Finalization	1st RPD #7	3/4/2005
Avg. Length of Time between Court Custody and Adoption Finalization	1st RPD #7	3/4/2005
Avg. Length of Time between Court Custody and Adoption Finalization	1st RPD #7	3/4/2005
Social Services Block Grant ("SSBG") Programmatic Reporting Worksheet for 10/01/03-9/30/04	1st RPD #7	3/4/2005
Social Services Block Grant ("SSBG") Programmatic Reporting Worksheet for 10/01/04-10/31/04	1st RPD #7	3/4/2005
Social Services Block Grant ("SSBG") Programmatic Reporting Worksheet for 10/01/04 -11/30/04	1st RPD #7	3/4/2005
Social Services Block Grant ("SSBG") Programmatic Reporting Worksheet for 10/01/04 - 12/31/04	1st RPD #7	3/4/2005
Summary of Children in Custody by Age, Race and Sex	1st RPD #7	3/4/2005
Summary of Children in Custody by Age, Race and Sex	1st RPD #7	3/4/2005
Summary of Children in Custody by Age, Race and Sex	1st RPD #7	3/4/2005
Summary of Children in Custody by Age, Race and Sex	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 9/6/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 10/05/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 11/05/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 12/04/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 01/05/05	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 09/06/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 10/05/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 11/05/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 12/04/04	1st RPD #7	3/4/2005
Listing of Children Freed for Adoption as of 01/05/05	1st RPD #7	3/4/2005
Children who are Legally Free for Adoption - Age Summary	1st RPD #7	3/4/2005
Children who are Legally Free for Adoption - Age Summary	1st RPD #7	3/4/2005
Children who are Legally Free for Adoption - Age Summary	1st RPD #7	3/4/2005
Children who are Legally Free for Adoption	1st RPD #7	3/23/2005
Children who are Legally Free for Adoption	1st RPD #7	3/23/2005
Children who are Legally Free for Adoption	1st RPD #7	3/23/2005
Adoptive Home Payment Register as of 9/30/04	1st RPD #7	3/23/2005
Adoptive Home Payment Register as of 10/31/04	1st RPD #7	3/23/2005
Adoptive Home Payment Register as of 11/30/04	1st RPD #7	3/23/2005
Adoptive Home Payment Register as of 12/31/04	1st RPD #7	3/23/2005
Adoption Cash Requirement Journal for September 2004	1st RPD #7	3/4/2005
Adoption Cash Requirement Journal for October 2004	1st RPD #7	3/4/2005
Adoption Cash Requirement Journal for November 2004	1st RPD #7	3/4/2005
Adoption Cash Requirement Journal for December 2004	1st RPD #7	3/4/2005
Adoption Assistance SAAS Interface Journal Voucher	1st RPD #7	3/4/2005
Adoption Assistance SAAS Interface Journal Voucher	1st RPD #7	3/4/2005
Adoption Assistance SAAS Interface Journal Voucher	1st RPD #7	3/4/2005
Adoption Assistance SAAS Interface Journal Voucher	1st RPD #7	3/4/2005
Children with Court Ordered TPR Request - State Totals	1st RPD #7	3/4/2005
Children with Court Ordered TPR Request - State Totals	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Children with Court Ordered TPR Requests	1st RPD #7	3/23/2005
Children with Court Ordered TPR Requests	1st RPD #7	3/23/2005
Children with Court Ordered TPR Requests	1st RPD #7	3/23/2005
Open Custody Cases: Summary & Exception Report	1st RPD #7	3/23/2005
Open Custody Cases: Summary & Exception Report	1st RPD #7	3/23/2005
Open Custody Cases: Summary & Exception Report	1st RPD #7	3/23/2005
Open Custody Cases: Length of Time Open - Summary, Quarterly Run for Period 01 April, 2004 Through 30 June, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Length of Time Open - Summary, Quarterly Run for Period 01 July, 2004 Through 30 September, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Length of Time Open - Summary, Quarterly Run for Period 01 October, 2004 Through 31 December, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Length of Time Open, Quarterly Run for Period of 01 April, 2004 Through 30 June, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Length of Time Open, Quarterly Run for Period of 01 July, 2004 Through 30 September, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Length of Time Open, Quarterly Run for Period 01 October, 2004 Through 31 December, 2004	1st RPD #7	3/4/2005
Closed Summary Page, Quarterly Run for Period 01 April, 2004 Through 30 June, 2004	1st RPD #7	3/4/2005
Closed Summary Page, Quarterly Run for Period 01 July, 2004 Through 30 September, 2004	1st RPD #7	3/4/2005
Closed Summary Page, Quarterly Run for Period 01 October, 2004 Through 31 December, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Summary & Exception Report (Annual Run)	1st RPD #7	3/23/2005
Open Custody Cases: Length of Time Open, Annual Run for Period 01 January, 2004 Through 31 December, 2004	1st RPD #7	3/4/2005
Open Custody Cases: Length of Time Opened - Summary, Annual Run for Period 01 January, 2004 Through 31 December, 2004	1st RPD #7	3/4/2005
Closed Summary Page, Annual Run for Period 01 January, 2004 Through 31 December, 2004	1st RPD #7	3/4/2005
Children without Social Security Number - State Summary	1st RPD #7	3/4/2005
Children without Social Security Number - State Summary	1st RPD #7	3/4/2005
Children in Custody without Valid Social Security Number	1st RPD #7	3/23/2005
Children in Custody without Valid Social Security Number	1st RPD #7	3/23/2005
Active Incoming ICPC for other than Household Member or Inactive Case	1st RPD #7	3/23/2005
Active Incoming ICPC for other than Household Member or Inactive Case	1st RPD #7	3/23/2005
List of Active Incoming ICPC Direct Services	1st RPD #7	3/4/2005
List of Active Incoming ICPC Direct Services	1st RPD #7	3/4/2005
List of Active Incoming ICPC Direct Services	1st RPD #7	3/23/2005
List of Active Incoming ICPC Direct Services	1st RPD #7	3/23/2005
Children with Re-Entries into Care	1st RPD #7	3/4/2005
Children with Re-Entries into Care	1st RPD #7	3/4/2005
Children with Re-Entries into Care	1st RPD #7	3/4/2005
Children with Re-Entries into Care During Period 07/01/03 to 06/30/04	1st RPD #7	3/23/2005
Children with Re-Entries into Care During the Year 2002	1st RPD #7	3/23/2005
Children with Re-Entries into Care During the Year 2002	1st RPD #7	3/23/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 01/01/2003 Ending 12/31/2003	1st RPD #7	3/4/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 09/01/2004 Ending 09/30/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 10/01/2004 Ending 10/31/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 11/01/2004 Ending 11/30/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 12/01/2004 Ending 12/31/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 01/01/2003 Ending 12/31/2003	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 09/01/2004 Ending 09/30/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 10/01/2004 Ending 10/31/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 11/01/2004 Ending 11/30/2004	1st RPD #7	3/4/2005
Number of Children Entering State Custody & Their Permanency Plan for the Reporting Period Starting 12/01/2004 Ending 12/31/2004	1st RPD #7	3/4/2005
Independent Living Report for Children Over 14 in Custody	1st RPD #7	3/4/2005
Independent Living Report for Children Over 14 in Custody	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care	1st RPD #7	3/23/2005
Stability of Foster Care Placements/Emergency Shelter Care Statewide Totals	1st RPD #7	3/4/2005
Stability of Foster Care Placements/Emergency Shelter Care Statewide Totals	1st RPD #7	3/4/2005
Stability of Foster Care Placements/Emergency Shelter Care Statewide Totals	1st RPD #7	3/4/2005
Stability of Foster Care Placements/Emergency Shelter Care Statewide Totals	1st RPD #7	3/4/2005
Stability of Foster Care Placements/Emergency Shelter Care Statewide Totals	1st RPD #7	3/4/2005
Stability of Foster Care Placements/Emergency Shelter Care Statewide Totals	1st RPD #7	3/4/2005
List of Placement Services for the reporting period 09/01/2004 thru 09/30/2004	1st RPD #7	3/23/2005
List of Placement Services for the reporting period 10/01/2004 thru 10/31/2004	1st RPD #7	3/23/2005
List of Placement Services for the reporting period 11/01/2004 thru 11/30/2004	1st RPD #7	3/23/2005
List of Placement Services for the reporting period 12/01/2004 thru 12/31/2004	1st RPD #7	3/23/2005
List of Preventive/Protective for the reporting period 09/01/2004 thru 09/30/2004	1st RPD #7	3/23/2005
List of Preventive/Protective for the reporting period 10/01/2004 thru 10/31/2004	1st RPD #7	3/23/2005
List of Preventive/Protective for the reporting period 11/01/2004 thru 11/30/2004	1st RPD #7	3/23/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
List of Preventive/Protective for the reporting period 12/01/2004 thru 12/31/2004	1st RPD #7	3/23/2005
Listing of Active Placement Children Age 14 & Older for the Month of 09 2004	1st RPD #7	3/23/2005
Listing of Active Placement Children Age 14 & Older for the Month of 10 2004	1st RPD #7	3/23/2005
Listing of Active Placement Children Age 14 & Older for the Month of 11 2004	1st RPD #7	3/23/2005
Listing of Active Placement Children Age 14 & Older for the Month of 12 2004	1st RPD #7	3/23/2005
Listing of Active Placement Children Age 14 & Older for the Month of 01 2005	1st RPD #7	3/23/2005
Listing of Children Age 14 & Older who Left Custody for the Month of 09 2004	1st RPD #7	3/23/2005
Listing of Children Age 14 & Older who Left Custody for the Month of 10 2004	1st RPD #7	3/23/2005
Listing of Children Age 14 & Older who Left Custody for the Month of 11 2004	1st RPD #7	3/23/2005
Listing of Children Age 14 & Older who Left Custody for the Month of 12 2004	1st RPD #7	3/23/2005
Listing of Children Age 14 & Older who Left Custody for the Month of 01 2005	1st RPD #7	3/23/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 02/01/2004 Ending 02/29/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 03/01/2004 Ending 03/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 04/01/2004 Ending 04/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 05/01/2004 Ending 05/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 06/01/2004 Ending 06/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 07/01/2004 Ending 07/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 08/01/2004 Ending 08/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 09/01/2004 Ending 09/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 10/01/2004 Ending 10/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 11/01/2004 Ending 11/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 12/01/2004 Ending 12/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 02/01/2004 Ending 02/29/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 03/01/2004 Ending 03/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 04/01/2004 Ending 04/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 05/01/2004 Ending 05/31/2004	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 06/01/2004 Ending 06/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 07/01/2004 Ending 07/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 08/01/2004 Ending 08/31/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 09/01/2004 Ending 09/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 10/01/2004 Ending 10/31/2004	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for the Reporting Period Starting 11/01/2004 Ending 11/30/2004	1st RPD #7	3/4/2005
Adult Abuse & Neglect Intake Report for the Reporting Period Starting 12/01/2004 Ending 12/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 02/01/2004 Ending 02/29/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 03/01/2004 Ending 03/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 04/01/2004 Ending 04/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 05/01/2004 Ending 05/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 06/01/2004 Ending 06/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 07/01/2004 Ending 07/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 08/01/2004 Ending 08/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 09/01/2004 Ending 09/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 10/01/2004 Ending 10/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 11/01/2004 Ending 11/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 12/01/2004 Ending 12/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 02/01/2004 Ending 02/29/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 03/01/2004 Ending 03/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 04/01/2004 Ending 04/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 05/01/2004 Ending 05/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 06/01/2004 Ending 06/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 07/01/2004 Ending 07/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 08/01/2004 Ending 08/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 09/01/2004 Ending 09/30/2004	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Child Abuse & Neglect Intake Report for the Reporting Period Starting 10/01/2004 Ending 10/31/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 11/01/2004 Ending 11/30/2004	1st RPD #7	3/4/2005
Child Abuse & Neglect Intake Report for the Reporting Period Starting 12/01/2004 Ending 12/31/2004	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 2/1/04 to 2/29/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 3/1/04 to 3/31/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 4/1/04 to 4/30/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 5/1/04 to 5/31/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 6/1/04 to 6/30/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 7/01/04 to 7/31/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 08/01/04 to 08/31/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 09/01/04 to 09/30/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 10/01/04 to 10/31/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 11/01/04 to 11/30/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Reports for Reporting Period 2/1/04 to 12/31/04	1st RPD #7	3/4/2005
Abuse & Neglect Intake Report for Reporting Period 12-01/04 to 12/31/04	1st RPD #7	3/4/2005
Children in Custody 14 & Over, 12th Grade & Higher, as of 10/5/04	1st RPD #7	3/23/2005
Children in Custody 14 & Over, 12th Grade & Higher, as of 11/05/04	1st RPD #7	3/23/2005
Children in Custody 14 & Over, 12th Grade & Higher, as of 12/4/04	1st RPD #7	3/23/2005
Children in Custody 14 & Over, 12th Grade & Higher, as of 10/05/05	1st RPD #7	3/23/2005
Children in Custody 14 & Over, 12th Grade & Higher, as of 2/5/05	1st RPD #7	3/23/2005
Number of Placements for Children in Active Custody as of 9/30/04	1st RPD #7	3/4/2005
Number of Placements for Children in Active Custody as of 10/31/04	1st RPD #7	3/4/2005
Number of Placements for Children in Active Custody as of 11/30/04	1st RPD #7	3/4/2005
Number of Placements for Children in Active Custody as of 12/31/04	1st RPD #7	3/4/2005
Number of Placements for Children in Active Custody as of 9/30/04	1st RPD #7	3/4/2005
Number of Placements for children in Active Custody as of 10/31/04	1st RPD #7	3/4/2005
Number of Placements for Children in Active Custody as of 11/30/04	1st RPD #7	3/4/2005
Number of Placements for Children in Active Custody as of 12/31/04	1st RPD #7	3/4/2005
List of Direct Services for Reporting Period 9/1/04 - 9/30/04	1st RPD #7	3/23/2005
List of Direct Services for Reporting Period 10/1/04 - 10/31/04	1st RPD #7	3/23/2005
List of Direct Services for Reporting Period 11/1/04 - 11/30/04	1st RPD #7	3/23/2005
List of Direct Services for Reporting Period 12/1/04 - 12/31/04	1st RPD #7	3/23/2005
Listing of Open Cases during 9/04	1st RPD #7	3/23/2005
Listing of Open Cases during 10/04	1st RPD #7	3/23/2005
Listing of Open Cases during 11/04	1st RPD #7	3/23/2005
Listing of Open Cases during 12/04	1st RPD #7	3/23/2005
Listing of Closed Cases during 9/04	1st RPD #7	3/23/2005
Listing of Closed Cases during 10/04	1st RPD #7	3/23/2005
Listing of Closed Cases during 11/04	1st RPD #7	3/23/2005
Listing of Closed Cases during 12/04	1st RPD #7	3/23/2005
Listing of Children 17 Years & 6 Months as of 10/05/04	1st RPD #7	3/23/2005
Listing of Children 17 Years & 6 Months as of 11/05/04	1st RPD #7	3/23/2005
Listing of Children 17 Years & 6 Months as of 12/04/04	1st RPD #7	3/23/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Listing of Children 17 Years & 6 Months as of 1/5/05	1st RPD #7	3/23/2005
Listing of Children 17 Years & 6 Months as of 02/05/05	1st RPD #7	3/23/2005
Number of Children in Placement by Placement Type, Annual Run for 12/31/03	1st RPD #7	3/4/2005
Number of Children in Placement by Placement Type, Annual Run for 12/31/04	1st RPD #7	3/4/2005
Summary of Children in Placement by Placement Type, Annual Run for 12/31/03	1st RPD #7	3/4/2005
Summary of Children in Placement by Placement Type, Annual Run for 12/31/04	1st RPD #7	3/4/2005
Children with Custody- Case-Placement Errors, Annual Run for 12/31/03	1st RPD #7	3/23/2005
Children with Custody- Case-Placement Errors, Annual Run for 12/31/04	1st RPD #7	3/23/2005
Number of Children Leaving State Custody & Their Outcome for 6/1/04-6/30/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 6/1/04-6/30/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 7/1/04-7/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 7/1/04-7/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 8/1/04-8/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 8/1/04-8/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 9/1/04-9/30/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 9/1/04-9/30/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 10/1/04-10/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 10/1/04-10/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 11/01/04-11/30/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 11/01/04-11/30/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 12/01/04-12/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 12/01/04-12/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for FY 1/1/03-12/31/03	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for FY 1/1/03-12/31/03	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 1/1/04-12/31/04	1st RPD #7	3/4/2005
Number of Children Leaving State Custody & Their Outcome for 1/1/04-12/31/04	1st RPD #7	3/4/2005
Prevention Cases Region Summary	1st RPD #7	3/4/2005
Prevention Cases Region Summary	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Prevention Cases Region Summary	1st RPD #7	3/4/2005
Prevention Cases Region Summary	1st RPD #7	3/4/2005
Protection Cases Region Summary	1st RPD #7	3/4/2005
Protection Cases Region Summary	1st RPD #7	3/4/2005
Protection Cases Region Summary	1st RPD #7	3/4/2005
Protection Cases Region Summary	1st RPD #7	3/4/2005
Performance Measure Data for Fiscal Year 2005 -- 7/1/04-6/30/05 -- broken down by month - includes July-September 2004	1st RPD #7	3/4/2005
Performance Measure Data for Fiscal Year 2005 -- 7/1/04-6/30/05 -- broken down by month -- includes July-October, 2004	1st RPD #7	3/4/2005
Performance Measure Data for Fiscal Year 2005 -- 7/1/04-6/30/05 -- broken down by month -- includes July-November 2004	1st RPD #7	3/4/2005
Performance Measure Data for Fiscal Year 2005 -- 7/1/04-6/30/05 -- broken down by month -- includes July-December 2004	1st RPD #7	3/4/2005
Support Services Count, Lists of Support Services with Recipients Count and Dollars Spent -- 9/1/04-9/30/04	1st RPD #7	3/4/2005
Support Services Count, Lists of Support Services with Recipients Count and Dollars Spent -- 10/1/04-10/31/04	1st RPD #7	3/4/2005
Support Services Count, Lists of Support Services with Recipients Count and Dollars Spent -- 11/01/04-11/30/04	1st RPD #7	3/4/2005
Support Services Count, Lists of Support Services with Recipients Count and Dolalrs Spent -- 12/01/04-12/31/04	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary - for May 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary - for June 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary - for July 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary for September 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary for October 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary for November 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Statewide Summary for December 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for May 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for June 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for July 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for August 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for September 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for October 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for November 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Statewide Summary for December 2004	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Child Investigation Timeliness Report - Regional Summary for May 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Regional Summary for June 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Regional Summary for August 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Regional Summary for September 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Regional Summary for October 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Regional Summary for November 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report - Regional Summary for December 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for May 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for June 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for July 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for August 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for September 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for October 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for November 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report - Regional Summary for December 2004	1st RPD #7	3/4/2005
Investigations with Narrative Errors for May 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for June 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for July 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for August 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for September 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for October 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for November 2004	1st RPD #7	3/23/2005
Investigations with Narrative Errors for December 2004	1st RPD #7	3/23/2005
Child Investigation Timeliness Report (for Investigator's Response) for May 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report (for Investigator's Response) for June 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report (for Investigator's Response) for July 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report (for Investigator's Response) for August 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report (for Investigator's Response) for September 2004)	1st RPD #7	3/4/2005
Child Investigation Timeliness Report (for Investigator's Response) for October 2004	1st RPD #7	3/4/2005
Child Investigation Timeliness Report (for Investigator's Response) for November 2004	1st RPD #7	3/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Child Investigation Timeliness Report (for Investigator's Response) for December 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for May 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for June 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for July 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for August 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for September 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for October 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for November 2004	1st RPD #7	3/4/2005
Adult Investigation Timeliness Report (for Investigator's Response) for December 2004	1st RPD #7	3/4/2005
County of Maltreated Children while in Custody in a Placement	1st RPD #7 and #35	3/4/2005
Summary of Maltreated Children while in Custody in a Placement	1st RPD #7 and #35	3/4/2005
County of Maltreated Children while in Custody in a Placement	1st RPD #7 and #35	3/4/2005
Summary of Maltreated Children while in Custody in a Placement	1st RPD #7 and #35	3/4/2005
State Quarterly Report In-Home Cases for Q3 FY 2002-2003	1st RPD #8	3/4/2005
State Quarterly Report In-Home Cases for Q4 FY 2002-2003	1st RPD #8	3/4/2005
State Report – Prevention/Protection Cases for Q1 – FY 2003-2004	1st RPD #8	3/4/2005
State Quarterly Report Quality Improvement for Q3 FY 2003-2004	1st RPD #8	3/4/2005
Region 1E Year End Quality Improvement report for FY 2003-2004	1st RPD #8	3/4/2005
Region 1E Quality Improvement report for Q1 FY 2004-2005	1st RPD #8	3/4/2005
Region 1E Quality Improvement report for Q2 FY 2004-2005	1st RPD #8	3/4/2005
Regions 1E, 1W, II & IV Quality Improvement report for Q1 FY 2004-2005	1st RPD #8	3/4/2005
Regions 1E, 1W, II & IV Quality Improvement report for Q2 FY 2004-2005	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for February 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for February 2004	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for February 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for February 2004 -	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for February 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for March 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for March 2004 - includes reference to Cody B.	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for March 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for March 2004	1st RPD #8	3/4/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Periodic Administrative Determination on Children in State's Custody for March 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for March 2004	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for March 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for April 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for May 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for June 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for July 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for July 2004	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for July 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for August 2004	1st RPD #8	3/23/2005
Periodic Administrative Determination on Children in State's Custody for September 2004	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for June 2004	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for November 2004	1st RPD #8	3/4/2005
Periodic Administrative Determination on Children in State's Custody for December 2004	1st RPD #8	3/23/2005
Title IV-E Foster Care Eligibility Review for 4/1/02-9/30/02	1st RPD #8	3/4/2005
Quality Improvement Report - Regional Comparison - for 1E, 1W, II and IV	1st RPD #8	3/4/2005
Quality Improvement Report - Q2 2003-2004 State Quarterly Report - Prevention/Protection Cases	1st RPD #8	3/4/2005
Homestead 2002 End of the Year Report	1st RPD #8	3/4/2005
Project Homestead Peer Review 2003 Report	1st RPD #8	3/4/2005
Mississippi Permanency partnership Network Project Homestead Peer Review Final Report - June 2004	1st RPD #8	3/4/2005
Non Compliance Issues Report for January 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for February 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for February 2004	1st RPD #9	3/4/2005
Non Compliance Issues Report for February 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for February 2004	1st RPD #9	3/4/2005
Non Compliance Issues Report for February 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for March 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for April 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for May 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for June 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for July 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for August 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for September 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for October 2004	1st RPD #9	3/23/2005
Non Compliance Issues Report for November 2004	1st RPD #9	3/23/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Non Compliance Issues Report for December 2004	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for January 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for February 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for March 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for April 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for May 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for June 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for July 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for August 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for September 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for October 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for November 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for December 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for January 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for February 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for March 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for April 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for May 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for June 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for July 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for August 2002	1st RPD #9	3/23/2005
No September Responses found		
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for October 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for November 2002	1st RPD #9	3/23/2005
Foster Care Review Non-Compliance Issues and Responses from Regional Directors for December 2002	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for January 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for February 2003	1st RPD #9	3/23/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Foster Care Review Summary Report - Issues in Foster Children's Cases for March 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for April 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for May 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for June 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for July 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for August 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for September 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for October 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for November 2003	1st RPD #9	3/23/2005
Foster Care Review Summary Report - Issues in Foster Children's Cases for December 2003	1st RPD #9	3/23/2005
State Level Citizens Review Board DFCS 5-Year Plan Review and Recommendations	1st RPD #13	3/4/2005
Foster Care Review Focus Group Info (6/28/03 Memo to Salters & Gillom from Diana Hiott re Focus Groups needed for Assessment; 7/9/03 memo to Gillom from Hamrick re Focus Group; 7/10/03 memo to Gillom from Hamrick re Focus Group; 7/17/03 memo to O'Bryant, et al from Gillom re Focus Group; 7/29/03 Agenda	1st RPD #15	3/4/2005
Letter from Natchez-Adams County Resource Alliance to MDHS Project Homestead re Quarterly Meetings	1st RPD #16	3/4/2005
Goals Table for Adams County Agencies' use of federal funds	1st RPD #16	3/4/2005
Report #3 - Individual Services Rating for Adams County, MS, Project Homestead Taskforce	1st RPD #16	3/4/2005
Memo from Sylvia Sessions, DHS Region V, to Natchez/Adams County Community Stakeholders re Meetings on 4/18 and 5/14/03	1st RPD #16	3/4/2005
Sign In sheet	1st RPD #16	3/4/2005
Letter to Steve Priester, DWS, from Shirley Wheatley re guidelines for Child Welfare Resource Center's request for comprehensive directory, et al.	1st RPD #16	3/4/2005
email from Nancy McFarland to Shirley Wheatley re address for NCWRC	1st RPD #16	3/4/2005
Adams County Service Array sign in sheet	1st RPD #16	3/4/2005
Adams County Community Service Array Sign in sheet	1st RPD #16	3/4/2005
Memo from Chunda Longino, Network Coordinator for Project Homestead, Region VI, to Wanda Gillom, DFCS re Service Array Results for Adams and Hinds Counties	1st RPD #16	3/4/2005
Adams Co. Service Array Sign In Sheet	1st RPD #16	3/4/2005
Hinds County Project Homestead Task Force	1st RPD #16	3/4/2005
email from Steve Priester to Morris Wynn, et al. re link on website	1st RPD #16	3/4/2005
email from Donna Hornsby to Cherri Hedglin re Lee County	1st RPD #16	3/4/2005
Report #2 - Conclusions - The 5 Categories of Services Contained in the Instrument	1st RPD #16	3/4/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Report #3 - Individual Services Rating	1st RPD #16	3/4/2005
Report #2 - Conclusions about the 5 Categories of Services Contained in the Instrument for Adams County	1st RPD #16	3/4/2005
Email from Steve Priester to Donna Hornsby, et al. re conference call meeting on 3/26/03	1st RPD #16	3/4/2005
Report #1 Summary Matrix	1st RPD #16	3/4/2005
Report #1 Summary Matrix - Adams Cnty	1st RPD #16	3/4/2005
Service Array Review: Benton Cnty, MS	1st RPD #16	3/4/2005
Service Array Review: Desoto Cnty, MS	1st RPD #16	3/4/2005
Routing Slip enclosing and "ARE" for Humphreys Cnty, MS and	1st RPD #16	3/4/2005
Memo from Tonita Vick to Cherri Hdglin re and enclosing Full Service Array for Humphreys Cnty	1st RPD #16	3/4/2005
The Service Array in Child Welfare: A Process for Assessment and Resource Development for Hancock Cnty, MS	1st RPD #16	3/4/2005
Service Array for Region II Grenada County and City,	1st RPD #16	3/4/2005
Service Array Reports 1, 2 and 3 for Hinds Cnty, MS	1st RPD #16	3/4/2005
Service Array Reports 1 and 2 plus table sheets for Itawamba Cnty, MS	1st RPD #16	3/4/2005
Service Array Reports 2 and 3 for Lauderdale Cnty, MS	1st RPD #16	3/4/2005
Service Array Report for Lee Cnty	1st RPD #16	3/4/2005
Service Array Report for Leflore Cnty	1st RPD #16	3/4/2005
Service Array Report for Madison Cnty	1st RPD #16	3/4/2005
Service Array Report(s) for Marion Cnty	1st RPD #16	3/4/2005
Service Array Report for Neshoba Cnty.	1st RPD #16	3/4/2005
Service Array Report for Pearl River Cnty	1st RPD #16	3/4/2005
Service Array Report for Quitman Cnty.	1st RPD #16	3/4/2005
Service Array Report for Stone Cnty	1st RPD #16	3/4/2005
Service Array Report for Warren Cnty	1st RPD #16	3/4/2005
Service Array Report for Yazoo Cnty.	1st RPD #16	3/4/2005
email to "CBCAP Lead Agencies" re Annual Report -	1st RPD #17	3/4/2005
Letter and enclosed Community Based Child Abuse Prevention Annual Performance Report dated 12/31/04 and for FY 2004 - 10/1/03-9/30/04	1st RPD #17	3/4/2005
Letter and enclosed Community Based Child Abuse Prevention Annual Performance Report dated 12/31/03 and for FY 2003 - 10/1/02-9/30/03	1st RPD #17	3/4/2005
Community Based Child Abuse Prevention Annual Performance Report dated 2/14/03 and for FY 2002 - 10/1/01-9/30/02	1st RPD #17	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Pam Blanton – Months of January-June, November & December 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Mary Ann Cooper –2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Carolyn Dodge -- 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Jean Fertitta – Months of January-July, 2002 – she was on med leave the rest of the year	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Rita Graham – Months of January-August & December 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Robert Hamrick –2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report – Foster Care Review Unit for Gertha Laurie –2002	1st RPD #20 Redacted	3/4/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Monthly Division Activity Report - Foster Care Review Unit for Glen Newton - 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Sarah Salmon- 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Rachel Sullivan- 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Kiki Williams Butler - 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Nita Shugars - 2002	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Alice Adair - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Pam Blanton - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Mary Ann Cooper - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Carolyn Dodge - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Jean Fertitta - 2003	1st RPD #20 Redacted	3/4/2005
(Monthly Division Activity Report - Foster Care Review Unit for Rita Graham- 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Gertha Laurie - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Glen Newton & Betty Sue Rayner - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Sarah Salmon - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Rachel Sullivan - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Kiki Williams - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Robert Hamrick - 2003	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Alice Adair - 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Pam Blanton - 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Kiki Williams- 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Mary Ann Cooper 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Carolyn Dodge - 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Jean Fertitta - 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Rita Graham - 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Robert Hamrick- 2004	1st RPD #20 Redacted	3/4/2005
Monthly Division Activity Report - Foster Care Review Unit for Leatheha Harness- 2004	1st RPD #20 Redacted	3/4/2005

[illegible]

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Mississippi Workload Management Sytem, County Social Service Workload Summary & 6-Mo. Averages	1st RPD #22	3/4/2005
Mississippi Workload Management Sytem, County Social Service Workload Summary & 6-Mo. Averages	1st RPD #22	3/4/2005
Mississippi Workload Management Sytem, County Social Service Workload Summary & 6-Mo. Averages	1st RPD #22	3/4/2005
Mississippi Workload Management Sytem, County Social Service Workload Summary & 6-Mo. Averages	1st RPD #22	3/4/2005
Licensed Foster Homes	1st RPD #27	3/4/2005
MDHS DFCS Licensed Facilities & Services, Residential Child Care Facilities and Child Placing Agencies	1st RPD #27	3/4/2005
Therapeutic Foster Care Placement Log and Pending Placements January & February 2005	1st RPD #29	3/23/2005
2 letters (11/18/03 & 8/12/03) to Thelma Brittain	1st RPD #30	3/4/2005
Attachment C - Part II - FY 2003, ETV Program Request for Funds for \$222,448	1st RPD #30	3/4/2005
MDHS, DIFCS - "Child & Families Service Plan Annual Progress & Services Report, 2003" dated June 30, 2003	1st RPD #30	3/4/2005
Letter from USDHHS to Don Taylor	1st RPD #33	3/4/2005
MDHS DFCS Program Improvement Plan TA Visit Agenda for 9/20-22/04	1st RPD #33	3/4/2005
Email from Carola Pike to Billy Mangold, et al. re preparation for onsite PIP TA	1st RPD #33	3/4/2005
"Federal Fiscal Year 2005 (FY '05) Social Services Block Grant (SSBG) Proposal" Program Year 10/1/04-9/30/05	3rd RPD #3	4/4/2005
FY 2005 Budget Request Package --sent from Teresa Jackson, DFCS Director to Peter Boulette, Dir, Office of Budgets, Cost Allocations & Grant Management: includes Budget Request, Attachment (Schedule) 2, Program Narrative, Budget Narrative, and Attachments A and B	3rd RPD #3	4/4/2005
FY 2006 Budget Request Package --sent from Billy Mangold, DFCCS Director to Peter Boulette, Dir, Office of Budgets, Cost Allocations & Grant Management: includes Budget Request, Attachment 2, Program Narrative, Budget Narrative, and Attachments A, , B and C	3rd RPD #3	4/4/2005
MDHS 5-Year Strategic Plan for FY 2004-2008	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2000 Budget Request	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2001 Budget Request	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2002 Budget Request	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2003 Budget Request	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2004 Budget Request	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2005 Budget Request	3rd RPD #3	4/4/2005
MDHS-DFCS FY 2006 Budget Request	3rd RPD #3	4/4/2005
MDHS 2005-2009 Chafe Foster Care Independence and Educational and Training Vouchers Programs	3rd RPD #3	4/4/2005
"Foster Care Services Fiscal Aspects of Foster Care"	3rd RPD #4	4/4/2005
Miss. Code Ann. § 43-15-17	3rd RPD #4	4/4/2005
Memo to MDHS and MS Assoc. of Child Care Agencies Interested Parties from Deirdre McGowan, Exec. Dir of Miss. Ass'n of Child Care Agencies re "Funding for Levels of Community Residential Care and <i>per diem</i> Operating Costs"	3rd RPD #4	4/4/2005
Table 6: Estimated Annual Expenditures on a Child by Husband-Wife Families in Rural Areas 2003	3rd RPD #4	4/4/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Table 4: Estimated Annual Expenditures on a Child by Husband-Wife Families, Urban South 2003	3rd RPD #4	4/4/2005
Table 7: Estimated Annual Expenditures on a Child by Single-Parent Families, Overall US 2003	3rd RPD #4	4/4/2005
Facts about Foster Care	3rd RPD #4	4/4/2005
The Cost of Raising A Child Compared to Foster Care Maintenance Payments	3rd RPD #4	4/4/2005
National Center for Resource Family Support Table by State of Foster Care Reimbursement Rates	3rd RPD #4	4/4/2005
House Bill #1747 re Appropriation to DHS for FY 2005	3rd RPD #6	4/4/2005
House Bill #1551 re Appropriation to DHS for FY 2004	3rd RPD #6	4/4/2005
Senate Bill #2905 re Appropriation to DHS for FY 2003	3rd RPD #6	4/4/2005
House Bill #1795 re Appropriation to DHS for FY 2003	3rd RPD #6	4/4/2005
House Bill #1625 re Appropriation to DHS for FY 2002	3rd RPD #6	4/4/2005
House Bill #1634 re Appropriation to DHS for FY 2001	3rd RPD #6	4/4/2005
Senate Bill #3182 re Appropriation to DHS from Special Funds for FY 2003	3rd RPD #6	4/4/2005
House Bill #1642 re Appropriation to DHS for FY 2000	3rd RPD #6	4/4/2005
Revised IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 12/31/99	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 3/31/00	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 6/30/00	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 12/31/00	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 3/31/01	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 6/30/01	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 9/30/01	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 12/31/01	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 3/31/02	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 6/30/02	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 9/30/02	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 12/31/02	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 3/31/03	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 6/30/03	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 9/30/03	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 12/31/03	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 3/31/04	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 6/30/04	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 9/30/04	3rd RPD #7	4/4/2005
IV-E Quarterly Report, ACF-IV-E-1 for quarter ending 12/31/04	3rd RPD #7	4/4/2005
MDHS DFCS Title IV-E Penetration Rate Report	3rd RPD #8	4/4/2005
Foster Care Services Fiscal Aspects of Foster Care "Foster Board Payment Breakdown"	3rd RPD #8	4/4/2005
"Children In Custody" report with years 2002-2004 included	3rd RPD #8	4/4/2005
101/03-6/30/04 Report lists number of permanency orders, visits, income verifications, etc -- no report name	3rd RPD #8	4/4/2005
IV-E Changes as of 9/30/02	3rd RPD #8	4/4/2005
IV-E Status Report as of 10/04 - Changes from IV-E to CWS pie chart	3rd RPD #8	4/4/2005
IV-E Status Report as of 10/04 - Changes from IV-E to CWS pie chart	3rd RPD #8	4/4/2005
USDHHS letter to Don Taylor re disallowance related to IV-E Eligibility Review of 2003	3rd RPD #9	4/4/2005
Miss. Title IV-E Foster Care Eligibility Review for 4/1/02-9/30/02	3rd RPD #9	4/4/2005
Letter from USDHHS to Thelma Brittain re approval of mandated PIP	3rd RPD #9	4/4/2005
Foster Care Services Fiscal Aspects of Foster Care	3rd RPD #12	4/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
TANF Financial Data for FY 2000	3rd RPD #14	4/4/2005
TANF Financial Data for FY 2001	3rd RPD #14	4/4/2005
TANF Financial Data for FY 2002	3rd RPD #14	4/4/2005
TANF Financial Data for FY 2003	3rd RPD #14	4/4/2005
US DHHS Notice of Grant Award FY 2000 letter to DHS	3rd RPD #14	4/4/2005
US DHHS Notice of Grant Award FY 2001 letter to DHS	3rd RPD #14	4/4/2005
US DHHS Notice of Grant Award FY 2002 letter to DHS	3rd RPD #14	4/4/2005
US DHHS Notice of Grant Award FY 2003 letter to DHS	3rd RPD #14	4/4/2005
US DHHS Notice of Grant Award FY 2004 letter to DHS	3rd RPD #14	4/4/2005
US DHHS Notice of Grant Award FY 2005 letter to DHS	3rd RPD #14	4/4/2005
PEER Report to Miss. Legislature re DHS' Use of Revenue Maximization Contracts	3rd RPD #16	4/4/2005
Letter to Don Taylor from Carlis Williams, Regional Administrator of USDHHS Region IV re PIP mandated 2/14/03	3rd RPD #16	4/4/2005
Letter to Thelma Brittain from Carlis Williams re PIP mandated 2/03	3rd RPD #16	4/4/2005
Letter to Carlis Williams from Thelma Brittain re Title IV-E Foster Care Eligibility Review	3rd RPD #16	4/4/2005
Letter/Fax Judith Ballard, Presiding Board Member MDHHS to various State Counsel re "Proposal for Consolidation on Common Legal Issue Raised by Disallowance of IV-E Administrative Costs"	3rd RPD #16	4/4/2005
Letter to Carolyn Reines-Graubard, Chief of USDHHS from David Carpenter, General Counsel Region IV, enclosing appeal Brief for the Administration for Children and Families for MDHS - Board Docket A-03-61	3rd RPD #16	4/4/2005
USDHHS Departmental Appeals Board Agreement	3rd RPD #16	4/4/2005
Letter to Don Lewis of Piper Rudnick from Bruce Granger, Chief Counsel of USDHHS and enclosing letter to Thelma Brittain re waiver of interest	3rd RPD #16	4/4/2005
Letter to Dr. Bettye Fletcher, Exec. Dir. MDHS from Carlis Williams re OIG Audit	3rd RPD #16	4/4/2005
MDHHS Office of the Inspector General's "Review of Ms. Participation in Title IV B....for FY 1994-1999"	3rd RPD #16	4/4/2005
MS State Auditor's Financial Audit Management Report for FY 2000	3rd RPD #16	4/4/2005
MS State Auditor's Financial Audit Management Report for FY 2001	3rd RPD #16	4/4/2005
MS State Auditor's Financial Audit Management Report for FY 2002	3rd RPD #16	4/4/2005
MS State Auditor's Financial Audit Management Report for FY 2003	3rd RPD #16	4/4/2005
MS State Auditor's Financial Audit Management Report for FY 2004	3rd RPD #16	4/4/2005
Letter to Janice Brooks, Exec. Dir MDHS, from Phil Bryant, MS State Auditor, re Audit of Review of the Miss. Children's Trust Fund - Performance Audit"	1st Supplement to 3rd RPD #16	4/11/2005
Stats for State of Mississippi, Calendar Year 2000	3rd RPD #17	4/4/2005
Stats for State of Mississippi, Calendar Year 2001	3rd RPD #17	4/4/2005
Stats for State of Mississippi, Calendar Year 2002	3rd RPD #17	4/4/2005
Stats for State of Mississippi, Calendar Year 2003	3rd RPD #17	4/4/2005
Family Preservation Statistical Demographics January - June 2004	3rd RPD #17	4/4/2005
Memorandum of Understanding between MDHS and JSU School of Social Work dated 3/20/03	3rd RPD #18	4/4/2005
Memorandum of Understanding between MDHS and Miss. Department of Mental Health dated 2/18/03	3rd RPD #18	4/4/2005
Memorandum of Understanding between MDHS and Partnership for a Healthy Mississippi dated 5/23/02	3rd RPD #18	4/4/2005
Div. Family & Children's Services Contractual Services for FY 2002	3rd RPD #20	4/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Div. Family & Children's Services Contractual Services for FY 2003	3rd RPD #20	4/4/2005
Div. Family & Children's Services Contractual Services for FY 2004	3rd RPD #20	4/4/2005
Div. Family & Children's Services Contractual Services for FY 2005 as of February 2005	3rd RPD #20	4/4/2005
"Weekly Significant Activities Report for 1/1/04-1/7/04" - from Wanda Gillom, Deputy Director DFCS to Thelma Brittain, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/8/04-1/13/04" - from Wanda Gillom, Deputy Director DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/14/04-1/21/04" - from Wanda Gillom, Deputy Director DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/26/04-1/30/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 2/2/04-2/5/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 2/9/04-2/13/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 2/16/04-2/20/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 2/23/04-2/27/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 3/3/04-3/5/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 3/8/04-3/12/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 3/15/04-3/19/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 3/22/04-3/26/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 4/5/04-4/9/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 4/5/04-4/9/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 4/19/04-4/23/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 4/26/04-4/30/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 5/3/04-5/7/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 5/11/04-5/14/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 5/18/04-5/21/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 5/24/04-5/28/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 6/1/04-6/4/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 6/7/04-6/11/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 6/14/04-6/18/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 6/21/04-6/25/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
"Weekly Significant Activities Report for 6/21/04-6/25/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 6/28/04-7/02/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 7/6/04-7/9/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 7/12/04-7/16/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 7/19/04-7/23/04/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 7/26/04-7/30/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 8/2/04-8/6/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 8/9/04-8/13/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 10/18/04-10/22/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 10/25/04-10/29/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 11/01/04-11/05/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 12/13/04-12/17/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 11/8/04-11/12/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 11/15/04-11/19/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 11/29/04-12/03/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 12/06/04-12/10/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 12/20/04-12/23/04" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 12/27/04-1/7/05" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/10/05-1/14/05" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/17/05-1/28/05" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/24/05-1/28/0505" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/30/05-12/4/05" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 2/14/05-2/18/05" - from Billy Mangold, Div. Dir DFCS to Don Taylor, Exec. Dir MDHS	3rd RPD #21	4/4/2005
"Weekly Significant Activities Report for 1/30/03-2/5/03" - from Wanda Gillom to Thelma Brittain	3rd RPD #21	4/4/2005
FY 2000 Monthly Budget Status Report - DFCS	3rd RPD #22	4/4/2005
FY 2001 Monthly Budget Status Report - DFCS	3rd RPD #22	4/4/2005
FY 2002 Monthly Budget Status Report - DFCS	3rd RPD #22	4/4/2005
FY 2003 Monthly Budget Status Report - DFCS	3rd RPD #22	4/4/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
FY 2004 Monthly Budget Status Report - DFCS -- October 2003 missing	3rd RPD #22	4/4/2005
FY 2005 Monthly Budget Status Report - DFCS - July 2004-January 2005	3rd RPD #22	4/4/2005
MDHS Org Chart as of 7/1/04	3rd RPD #23	4/4/2005
MDHS Report for 48522 - Children	1st Interrogatories #3A&B, 7 A&B	5/24/2005
Custody Contact Report	1st Interrogatories #4	5/24/2005
Foster Home Board Rate Effective 7/99	1st Interrogatories #4	5/24/2005
Licensed Foster Homes	1st Interrogatories #4	5/24/2005
Licensed Foster Homes	1st Interrogatories #4	5/24/2005
Licensed Foster Homes	1st Interrogatories #4	5/24/2005
MDHS Summary of Children in Placements by Placement Type - Annual Run for 12/31/04	1st Interrogatories #5	5/24/2005
MDHS Summary of Children in Placements by Placement Type - Annual Run for 12/31/04	1st Interrogatories #5	5/24/2005
Licensed Facilities and Services - Residential Child Caring Facilities and Child Placing Agencies	1st Interrogatories #6 and 7	5/24/2005
MDHS Report for 48522 - Resources	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources -- Catholic Charities, Inc -- Adoption/Foster Care Service Homes	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources -- Catholic Charities, Inc -- Therapeutic Foster Homes	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources -- Catholic Charities, Inc -- UNACC.REF. Minor Foster Homes	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources -- Gardner-Simmons Home for Girls, Inc.	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources - Mississippi Children's Home Society Foster Home	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources -- Southern Christian Services for Children & Youth Foster Homes	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources - Stepping Stones Foster Homes	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources - Sunnybrook Children's Home & Shelter Foster Homes	1st Interrogatories #7A	5/24/2005
MACWIS Subordinated Resources - Youth Villages Foster Homes	1st Interrogatories #7A	5/24/2005
MDHS Report for 48522 - Licenses	1st Interrogatories #7C	5/24/2005
2003 Foster Care Investigation Listing	1st Interrogatories #13	5/24/2005
2004 Foster Care Investigation Listing	1st Interrogatories #13	5/24/2005
2005 Foster Care Investigation Listing (to date)	1st Interrogatories #13	5/24/2005
MDHS Consultants	1st Interrogatories #20	5/24/2005
Welcome & Orientation Intensive Training	4th RPD #1	5/24/2005
Intensive Training Exam	4th RPD #1	5/24/2005
Intake Training	4th RPD #1	5/24/2005
Investigation Training	4th RPD #1	5/24/2005
Assessment Training	4th RPD #1	5/24/2005
Adult Protective Services Training	4th RPD #1	5/24/2005
Prevention & Protection Training	4th RPD #1	5/24/2005
Placement Training	4th RPD #1	5/24/2005
ISP for Parents -- Training	4th RPD #1	5/24/2005
County Conference Training	4th RPD #1	5/24/2005
Court Training	4th RPD #1	5/24/2005

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
Interstate Placement for Dependent Children History Training	4th RPD #1	5/24/2005
Termination of Parental Rights Training	4th RPD #1	5/24/2005
Adoption Training	4th RPD #1	5/24/2005
Closing a Case Training	4th RPD #1	5/24/2005
Prevention and Protection	4th RPD #1	5/24/2005
Agreement between MDHS & Jackson State for "competency based education for a minimum of 26 pre-service students, etc. - 1/1/03-6/30/03 - \$440469.71	4th RPD #3	5/24/2005
Agreement between MDHS & Jackson State for "competency based education for 37-41 pre-service students, etc. - 7/1/03-6/30/04 - \$6086775.98	4th RPD #3	5/24/2005
Agreement between MDHS & Jackson State for "competency based education for a minimum of 45 pre-service students, etc., ongoing training for current staff, curricula and 36 hrs. of training for parents, evaluation of program/process - 12/1/04-6/30/05 -- \$4603902.70	4th RPD #3	5/24/2005
PATH (Parents as Tender Healers) Participant's Handbook - Training Manual	4th RPD #4	5/24/2005
PATH Training Manual	4th RPD #4	5/24/2005
Quality Improvement "Training" Manual	5th RPD #4	5/31/2005
QA Reference Guide 2002-2003	5th RPD #4	5/31/2005
QA Case Record Review Instrument - blank	5th RPD #4	5/31/2005
ISP Process Training Info	5th RPD #4	5/31/2005
Federal Review Targets	5th RPD #4	5/31/2005
Quality Improvement -- What to Do	5th RPD #4	5/31/2005
Print ad "Children Belong In Families"	5th RPD #5	5/31/2005
Print ad "Children Belong in Families"	5th RPD #5	5/31/2005
Print ad "Kids in MS need Moms & Dads"	5th RPD #5	5/31/2005
Card ad "Children Belong in Families"	5th RPD #5	5/31/2005
Card ad "Kids in MS need Moms & Dads"	5th RPD #5	5/31/2005
Preparing to be A Foster Parent Booklet	5th RPD #5	5/31/2005
Children Belong in Families - Become a Foster or Adoptive Parent Foldout	5th RPD #5	5/31/2005
Children Belong in Families - We Need Foster and Adoptive Families in MS card	5th RPD #5	5/31/2005
MDHS PSA's CD	5th RPD #5	5/31/2005
MDHS MACWIS Desk Reference Guide	5th RPD #6	5/31/2005
MACWIS "Helps"	5th RPD #6	5/31/2005
MACWIS "User Manual" as of 6/28/01	5th RPD #6	5/31/2005
Request for Proposal - Community-based Family Resource and Support Grant - Application Date 5/12/03 due by 6/5/03	5th RPD #7	5/31/2005
RFP - Community Based Family Resource & Support Grant - Application Date 4/5/02 - Due 5/6/02	5th RPD #7	5/31/2005
RFP - Family Support Services - Application Date 10/22/02 , Due Date 11/15/02	5th RPD #7	5/31/2005
RFP - Pre and Post Adoption Service - Adoption Incentive Payment Program, Pilot Project - Issue Date 1/15/02, Due Date 2/15/02	5th RPD #7	5/31/2005
RFP - Family Support Services - Application Date 5/12/03, Due Date 6/6/03	5th RPD #7	5/31/2005
RFP - Family Support Services - Issue Date 5/9/04, Due Date 6/17/04	5th RPD #7	5/31/2005
RFP - Placement Services, Emergency Shelter/Diagnostic and Evaluation Center, Issue Date 7/15/04, Due Date 8/13/04	5th RPD #7	5/31/2005

EXHIBIT "B"

List of Documents Produced In Response to Plaintiffs' Request for Production of Documents		
Document Description	Produced In Response to	Date Produced
RFP - Placement Services - Issue Date 9/10/04, Due date 10/22/04	5th RPD #7	5/31/2005
RFP - Children's Justice Act of The Child Abuse Prevention & Treatment Act, Issue Date 9/10/04, Due date 10/22/04	5th RPD #7	5/31/2005
RFP - Child Abuse Prevention & Treatment Act, State Basic Grant, Issue Date 9/10/04, Due 10/22/04	5th RPD #7	5/31/2005
RFP - Protection Services MDHS Hotline 24 Hours 7 Days a Weeks	5th RPD #7	5/31/2005
RFP - Placement Services, Post Adoption Support Services, Issue 10/19/04, Due 11/19/04	5th RPD #7	5/31/2005
Quarterly Reports compiling data reported on social worker time studies - which were limited to social workers assigned to IV-E Waiver demonstration project counties	5th RPD #8	5/31/2005
Placement Resources - Listing of all Placements (except private foster homes) including Emergency Shelters, Regular Group Homes, Independent Living, Intensive In-Home Services, Therapeutic Foster and Group Homes, Chemical Dependent Group Homes, Specialized Residential School, Respite Homes, Nursing Homes, Mental Retardation Centers, Residential Treatment Centers, Acute Care Hospitals, Adult Mental Health and Mental Retardation Group Homes	5th RPD #9	5/31/2005